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and Josue Bonilla, individually and on behalf of all  
others similarly situated; Diana Block;  
and Community Resource Initiative*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JOSHUA SIMON, DAVID BARBER,  
AND JOSUE BONILLA, individually and  
on behalf of all others similarly situated;  
DIANA BLOCK, an individual; and  
COMMUNITY RESOURCE  
INITIATIVE, an organization,

Plaintiffs,

v.

CITY AND COUNTY OF SAN  
FRANCISCO; and PAUL MIYAMOTO,  
in his official capacity as San Francisco  
Sheriff,

Defendants.

Case No.: 4:22-cv-05541-JST

**DECLARATION OF AVRAM FREY  
IN SUPPORT OF JOINT  
SUPPLEMENTAL BRIEF**

Trial Date: Not Set  
Judge: Hon. Jon S. Tigar

**DECLARATION OF AVRAM FREY**

I, Avram Frey, declare as follows:

1. I am duly admitted to practice in the State of California and am an attorney with the American Civil Liberties Union Foundation of Northern California. I am counsel for Plaintiffs Joshua Simon, David Barber, Josue Bonilla, Diana Block, and Community Resource Initiative (collectively “Plaintiffs”) in the above-captioned matter. I have personal knowledge of the matters stated herein. If called as a witness, I could and would competently testify to the matters stated herein. This declaration is submitted in support of the parties’ Joint Supplemental Brief.

2. On August 28, 2023, Defendant City and County of San Francisco (“Defendant”) served responses and objections to Plaintiffs’ First Set of Interrogatories. A true and correct copy of Defendant’s responses are attached hereto as **Exhibit A**.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed this 6th day of October, 2023, in San Francisco, California.

/s/ Avram Frey  
Avram Frey